

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2007 APR 17 A 10:23

BILL LIETZKE

*

547 SOUTH PREEY STREET

APARTMENT 10

*

MONTGOMERY, ALABAMA 36104

(Full name and address of the plaintiff)

Plaintiff(s)

+

VS.

Civil No.:

(Leave blank. To be filled in by Court.)

BOBBY BRIGHT

ART BAYLOR

103 NORTH PERRY STREET

320 NORTH RIPLEY STREET

MONTGOMERY, ALABAMA

MONTGOMERY, ALABAMA

(Full name and address of the defendant(s))

Defendant(s)

COMPLAINT

1. Jurisdiction in this case is based on:

- ☐ Diversity (none of the defendants are residents of the state where plaintiff is a resident)
- ☒ Federal question (suit is based upon a federal statute or provision of the United States Constitution)
- ☐ Other (explain) _____

1. On October 23, 2005, by and through its agent police officers, City of Montgomery Defendants procured the false imprisonment of the Plaintiff Bill Lietzke on the false charge that the Plaintiff was flagging down cars, walking in the middle street, trying to get cars to stop, etc.

2. All allegations as such City of Montgomery Defendants supplied to the Montgomery Municipal Court were categorically denied by the Plaintiff, and the Plaintiff entered the plea of NOT GUILTY.

3. Said actions by City of Montgomery Defendants are indicative of another case of false imprisonment where the Plaintiff was falsely arrested on another public street by City of Montgomery Defendants on May 10, 1999 and charged with flagging down cars and trying to get cars to stop. The Plaintiff also pleaded NOT GUILTY in that case.

4. On October 26, 2005, the Plaintiff was discharged from the Montgomery City Jail, 320 North Ripley Street.

5. On January 18, 2005, by and through its agent police officers, City of Montgomery Defendants approached the 500 block of South Perry Street from Grove Street, circled the 500 block of South Perry Street moments after passing the Plaintiff, returned to the 500 block of South Perry Street, stopped in front of 547 South Perry Street in front of the Plaintiff and jumped out of the car. When the Plaintiff crossed South Perry Street, City of Montgomery Defendants crossed South Perry Street following and stalking the Plaintiff. City of Montgomery Defendants pointed another dangerous at the Plaintiff, forced the Plaintiff to halt, and engaged in a flurry of unnecessary interrogatories. City of Montgomery Defendants released the Plaintiff and alleged, "We're not going to charge you with anything."

6. On July 13, 2004, by and through its agent police officers, City of Montgomery Defendants backed up in a white Ford Taurus moments after passing the Plaintiff, jumped out of the Taurus and pointed

2. The facts of this case are:

their loaded pistols at the Plaintiff for absolutely nothing in front of 547 South Perry Street. City of Montgomery Defendants continued to taunt, bully, and terrorize the Plaintiff exclaiming, "Get on your knees, get on your knees." "Put your hands behind your head, put your hands behind your head." "I'll shoot you." City of Montgomery Defendants proceeded to 547 South Perry Street to the Plaintiff's driveway and encountered the Plaintiff's neighbor upstairs on the third floor. City of Montgomery Defendants alleged to the neighbor, "Is he alright?" "Does he live here?"

7. On March 4, 2007, by and through its agent police officers, City of Montgomery Defendants approached the 300 block of South Perry Street and harassed the Plaintiff from the window of the patrol car. When the Plaintiff remain silent, City of Montgomery Defendants parked in front of First Baptist Church, 305 South Perry Street, jumped out of the car, and unlawfully detained the Plaintiff. City of Montgomery Defendants alleged, "You got somewhere to go?" "You can't be hanging around the church if you ain't going in the church."

8. On January 19, 2007, by and through its agent police officers, City of Montgomery Defendants approached the 500 block of South Perry Street from Grove Street, jumped out of the car $\frac{1}{2}$ block from 547 South Perry Street and beckoned the Plaintiff by hand. When the Plaintiff refused, City of Montgomery Defendants followed and stalked the

to his patrol car. City of Montgomery Defendants handcuffed the Plaintiff for nothing, searched the Plaintiff for nothing, and forced the Plaintiff to lean against his patrol car for nothing. Shortly thereafter, City of Montgomery Defendants removed the handcuffs, released the Plaintiff, and alleged, "You're free to go." One court reporter from Shinbaum, Abell, McLeod, and Vann, P. C. known as Patricia witnessed this incident. One Regions Mortgage, Inc. employee known as Sharon witnessed this incident.

9. On January 8, 2007, by and through its agent police officers, City of Montgomery Defendants broke into the Plaintiff's living door, entered the Plaintiff's residence, 547 South Perry Street, Apt. 10 and pointed their loaded pistols at the Plaintiff and shined their flashlights at the Plaintiff inside the Plaintiff's house at 3:10a.m. in the morning without probable cause therefor. For absolutely no reason, City of Montgomery Defendants continued to taunt, bully, and terrorize the Plaintiff exclaiming, "Let me see your hands, let me see your hands," "Get down on the floor, get down on the floor." City of Montgomery Defendants grabbed the Plaintiff inside his bedroom and forced the Plaintiff's head to hit the floor of the Plaintiff's bedroom. City of Montgomery Defendants handcuffed the Plaintiff inside his bedroom while the Plaintiff was forced to lie face down on the Plaintiff's bedroom floor. City of Montgomery Defendants proceeded to order the Plaintiff to state his name, already knowing the Plaintiff's name. City of Montgomery Defendants stated that if the Plaintiff didn't tell them his name City of Montgomery Defendants were going to take the Plaintiff to jail. At this time, another Defendant entered the Plaintiff's house. "Sargeant Bruce" alleged that these Defendants were going to release the Plaintiff. Shortly thereafter, City of Montgomery Defendants removed the handcuffs, release the Plaintiff, and left the Plaintiff's house.

3. The relief I want the court to order is:

☐ Damages in the amount of: _____

☐ An injunction ordering: _____

☐ Other (explain) _____

(original signature of plaintiff)

(address of plaintiff)

10. On December 13, 2006, by and through its agent police officers, City of Montgomery Defendants sped through the Plaintiff's neighborhood of law firms and mortgage companies in at least seven patrol cars and parked in front of San Souci Apartments, 547 South Perry Street and parked at 529 South Perry Street, office spaces and leasing properties of The Stowers Management, the Plaintiff's landlord. The Plaintiff entered the law firm of Shinbaum, Abell, McLeod, and Vann, P. C., 566 South Perry Street across the street from 547 South Perry Street and informed the secretaries of Shinbaum, Abell, McLeod, and Vann, P. C. that City of Montgomery Defendants are crossing South Perry Street following and stalking the Plaintiff and are now entering these law offices following and stalking the Plaintiff. One of the secretaries known as April witnessed City of Montgomery Defendants enter Shinbaum, Abell, McLeod, and Vann, P. C. grabbing the Plaintiff by the shoulders and arms, handcuffing the Plaintiff and dragging the Plaintiff out of Shinbaum, Abell, McLeod, and Vann, P. C. to their patrol cars parked in front of 547 South Perry Street. City of Montgomery Defendants continued to taunt, bully, and terrorize the Plaintiff placing handcuffs on the Plaintiff's wrists that injured the Plaintiff and forcing the Plaintiff's head to hit the trunk of their car. A suspicious black male parked at 529 South Perry Street left this scene. City of Montgomery Defendants placed the Plaintiff inside their car and moments later ordered the Plaintiff to get out of the car. City of Montgomery Defendants removed the handcuffs, released the Plaintiff, and alleged, "There is no charge." "Go on, go on."

11. The Plaintiff avers that City of Montgomery Defendants struck, shoved, kicked, or otherwise touched the Plaintiff and subjected the Plaintiff to RECORD NUMBER unlawful physical contacts and RECORD NUMBER unlawful searches and seizures;

2. The facts of this case are: 12. The Plaintiff avers that City of Montgomery Defendants knowingly touched the Plaintiff with the intent to injure, insult, and provoke the Plaintiff.

13. The Plaintiff avers that City of Montgomery Defendants by physical action intentionally placed the Plaintiff in fear of imminent serious physical injury pointing loaded pistols at the Plaintiff.

14. The Plaintiff avers that City of Montgomery Defendants entered the Plaintiff's residential structure, 547 South Perry Street, Apt. 10 and remained unlawfully therein.

15. The Plaintiff avers that City of Montgomery Defendants unlawfully entered and remained in the Plaintiff's residential yard, looking into the Plaintiff's residential structure thereon in complete reckless disregard of the Plaintiff's right of privacy.

16. The Plaintiff avers that City of Montgomery Defendants violated the Plaintiff's constitutional rights by subjecting the Plaintiff to harassments and unlawful detentions.

17. The Plaintiff avers that City of Montgomery Defendants have repeatedly violated the Plaintiff's right to freedom of speech and freedom of assembly, in violation of the Plaintiff's First Amendment rights of the United States Constitution.

18. The Plaintiff avers that City of Montgomery Defendants have repeatedly violated the Plaintiff's right against RECORD NUMBER 2
U.S. District Court (Rev. 12/2000)
unlawful searches and seizures, in violation of the Plaintiff's Fourth Amendment rights of the United States Constitution,

19. The Plaintiff avers that City of Montgomery Defendants negligently failed to provide the skill and care required of its agents under Section 1-47-190, Alabama Code 1975, failed to protect and serve the Plaintiff, and failed again to prevent the injuries received by the Plaintiff as described above, either directly by the officers in their failure to protect the Plaintiff, or indirectly when considering the officers were acting under the scope and control to the City of Montgomery's police department in a respondeat superior capacity.

20. The Plaintiff avers that City of Montgomery Defendants had a duty to provide the requisite skill and care required by Alabama law, and a duty to protect and serve the Plaintiff through their officers of the law in facilitating the safety of the general public. City of Montgomery Defendants breached that duty to protect and serve the Plaintiff with the requisite skill and care levels over and over, and over again.

21. The Plaintiff further avers that the final decision makers namely, Mayor Bobby Bright and police chief Art Baylor, have permitted a custom and policy of harassment against the Plaintiff and other similarly situated in violation of Title 42 U. S. C. Section 1983.

3. The relief I want the court to order is: **Stephanie Mohr TAKEN OUT OF the West Virginia prisons, and City of Montgomery Defendants THROWN INTO the West Virginia prisons.** **\$2,000,000,000.00**

☐ Damages in the amount of: _____

☐ An injunction ordering: Intersections of Grove Street at South Court Street and Grove Street at South McDonough Street are shut down for good, blocked off, and closed out permanently, indefinitely, and IMMEDIATELY to the general public expelling Alabama City of Montgomery agent police officers and expelling African american Negroes who are Other (explain) not supposed to be in this area at all, and who have absolutely no business at all in this district.

~~The Plaintiff wants the Court to order City of Montgomery police officers are trespassing San Souci Apartments, 547 South Perry Street and City of Montgomery police officers are trespassing 529 South Perry Street, private property of the Plaintiff's landlord, The Stowers Management, 1631 East Fairview Avenue.~~

(original signature of plaintiff)

547 SOUTH PERRY STREET

APARTMENT 10

MONTGOMERY, ALABAMA 36104

(address of plaintiff)

Stephanie Mohr, a former Prince George County police officer, was sentenced by the federal court to serve 10 years in an Alderson, West Virginia prison. Stephanie Mohr released her police dog named Valk on Ricardo Mendez, who is a minority from San Salvador, on or about September 21, 1995. The United States Justice Department, Civil Rights Division, prosecuted Stephanie Mohr five years later in 2000, with the assistance from civil rights organizations, and convicted Stephanie Mohr of police brutality. But the civil rights violations, constitutional deprivations, and the menacing practices of these City of Montgomery Defendants from the State of Alabama, and the multiple incidents of City of Montgomery harassments outlined in federal case against City of Montgomery Defendants Bobby Bright and Art Baylor make **STEPHANIE MOHR** look like a **SUNDAY SCHOOL TEACHER.**

4. Intersections of Grove Street at South Court Street and Grove Street at South McDonough Street that leads to Regions Mortgage, Inc., 605 South Perry Street, Jim Inscoe Agency Real Estate, 572 South Perry Street, Regions Mortgage, Inc., 555 South Perry Street, Shinbaum, Abell, McCleod, and Vann, P. C., 566 South Perry Street, Holloway and Moxley, LLC, Attorneys at Law, 556 South Perry Street, San Souci Apartments, 547 South Perry Street, Joseph G. Stewart, P. C., 559 South Lawrence Street, James and Pittman, P. C., Attorneys at Law, 611 South Lawrence, Yvette Smiley Smith, CPA, 575 South Lawrence Street are PERMANENTLY, INDEFINITELY, and IMMEDIATELY shut down, blocked off, and closed out to the general public expelling City of Montgomery police officers and expelling African american black folks who are not supposed to be in the area at all and who have absolutely no business at all in this neighborhood, all City of Montgomery signs in this area dismantled IMMEDIATELY, reconstruction and resurfacing works in this area of Regions Mortgage, Inc. put into effect IMMEDIATELY, large dividing walls and large fences constructed and set up in this area at both of these intersections with "NO TRESPASSING," "PRIVATE PROPERTY," and "KEEP OUT" signs affixed thereto IMMEDIATELY, another large dividing wall and large fence constructed and set up in this area, additional lighting fixtures installed in this area of Regions Mortgage, Inc. IMMEDIATELY, and "NO TRESPASSING," "PRIVATE PROPERTY," "NO PARKING," "MINIMUM FINE 20, 000 .00" signs installed in this area of Regions Mortgage, Inc. IMMEDIATELY.

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2007 APR 17 A 10:23

CLERK'S OFFICE
FEDERAL JUDICIAL CENTER
BY _____ DEPUTY

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

BILL LIETZKE,

PLAINTIFF,

V.

CITY OF MONTGOMERY, ET AL,
BOBBY BRIGHT, ART BAYLOR,
State of Alabama police
officers employed by the
Alabama City of Montgomery
who are responsible for
all incidents stated in the
Plaintiff's Complaint, all
others whose true names
and legal descriptions are
unknown to the Plaintiff,

DEFENDANTS.

FIRST DEGREE CRIMINAL TRESPASSING
CONSTITUTIONAL DEPRIVATIONS
CIVIL RIGHTS VIOLATIONS
COMMON LAW NEGLIGENCE
HARASSMENT

1. Jurisdiction founded on the existence of a federal question and amount in controversy.

2. The action arises out of the Constitution of the United States, Article III, Section II, as hereinafter more fully appears.

FD-344 (Rev. 11/94)

CIVIL COVER SHEET

The FD-344 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

BILLY LIETZKE

(b) County of Residence of First Listed Plaintiff MONTGOMERY

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

547 SOUTH PERRY STREET, APT. 10
1 (334) 834-8602

DEFENDANTS

CITY OF MONTGOMERY, ET AL
BOBBY BRIGHT, ART BAYLOR

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, SEE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION

(Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT

(Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Motor Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Maritime Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input checked="" type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Adverse Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Science of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 750 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 432 Appeal 28 USC 158 <input type="checkbox"/> 435 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 SSA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DEWC/DWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Expropriation <input type="checkbox"/> 410 Arbitration <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Consumer <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influence and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat. TV <input type="checkbox"/> 510 Selective Service <input type="checkbox"/> 550 Securities/Commodities Exchange <input type="checkbox"/> 575 Customer Challenge 12 USC 3410 <input type="checkbox"/> 590 Other Statutory Actions <input type="checkbox"/> 591 Agricultural Acts <input type="checkbox"/> 592 Economic Stabilization Act <input type="checkbox"/> 593 Environmental Matters <input type="checkbox"/> 594 Energy Allocation Act <input type="checkbox"/> 595 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Contamination <input type="checkbox"/> 220 Eminent Domain <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Tenants Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input checked="" type="checkbox"/> 447 Other Civil Rights PRISONER PETITIONS <input type="checkbox"/> 310 Motions to Vacate Sentence <input type="checkbox"/> 330 General <input type="checkbox"/> 355 Death Penalty <input type="checkbox"/> 340 Habeas Corpus & Other <input type="checkbox"/> 350 Civil Rights <input type="checkbox"/> 353 Prison Condition			

V. ORIGIN

(Place an "X" in One Box Only)

- ☐ 1 Original Proceedings
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation
- ☐ 7 Appeal to District Judge from Magistrate Judgment

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

VI. CAUSE OF ACTION

Brief description of cause:

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$1,000,000,000.00

CHECK YES only if demanded in complaint:
JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions)

JUDGE

DOCKET NUMBER

DATE

29TH DAY OF MARCH, 2007

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
2007 APR 17 A 10:22

BILL LIETZKE

Plaintiff

vs.

Civil Action No. _____

CITY OF MONTGOMERY, ET AL,
BOBBY BRIGHT, ART BAYLOR

Defendant

MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS

Plaintiff hereby requests leave, pursuant to 28 U.S.C. §1915, to proceed "*in forma pauperis*" (without prepayment of costs). In support of this motion, plaintiff attaches an affidavit.


Signature

BILL LIETZKE

Name (Print or Type)

547 SOUTH PERRY STREET, APT. 10

Address

MONTGOMERY, ALABAMA 36104

City/State/Zip

1 (334) 834-8602

Phone No.

Fax No.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2007 APR 17 A 10:23

BILL LIETZKE

Plaintiff

VS.

Civil Action No. _____

CITY OF MONTGOMERY, ET AL,
BOBBY BRIGHT, ART BAYLOR

Defendant

AFFIDAVIT IN SUPPORT OF MOTION FOR LEAVE TO PROCEED
IN FORMA PAUPERIS

I, BILL LIETZKE, declare that I am the plaintiff in the above-entitled case. I understand that the filing fee for most civil suits is \$250.00. In support of my motion to proceed without being required to prepay the filing fee and other costs, I state that: (1) because of my poverty I am unable to pay such fee and costs, or give security therefor, and (2) I believe I am entitled to relief in this proceeding. The nature of my complaint is briefly stated as follows (employment discrimination, Social Security, civil rights, or other): In this civil rights case, the Defendants conducted acts of RECORD NUMBER unlawful searches and seizures in which the Defendants knew were excessive.

In further support of this motion, I answer the following questions:

1. Are you presently employed?

☐ Yes ☒ No

a. If the answer is "yes," state the amount of your salary or wages per month, and give the name and address of your employer. List both gross and net (take-home) pay.

Employer: _____ Monthly Gross: \$ _____
_____ Monthly Net: \$ _____

- b. If the answer is "no," state the date of last employment, the name and address of your employer, and the amount of salary or wages per month you received.

Date: MAY, 1984
 Employer: THE LERNER SHOPS Monthly Gross: \$ 2.99
 Monthly Net: \$

2. Have you received within the past 12 months any income from: (1) settlements, judgments, or monetary awards following compensation, or disability payments; (2) Social Security, public assistance, workers' compensation, or disability payments; (3) a business, profession or other form of self-employment; (4) rent payments, interest, or dividends; (5) retirement, annuity, pension or insurance payments; (6) gifts or inheritances; or (7) any other sources?

☒ Yes ☐ No

<u>Received:</u>	<u>Source:</u>
\$ <u>648.00</u>	<u>SUPPLEMENTAL SECURITY INCOME, SOCIAL SECURITY</u>
\$ <u></u>	<u></u>
\$ <u></u>	<u></u>
\$ <u></u>	<u></u>

Do you expect this income to continue: ☒ Yes ☐ No

3. Do you have any cash on hand, or money in savings or checking accounts? ☒ Yes ☐ No

If yes, state total amount: \$ 10.00

4. Do you own or have any interest in any real estate, stocks, bonds, notes, automobiles, or other valuable property (excluding ordinary household furnishings and clothing)? ☐ Yes ☒ No

If yes, give value and description:

<u>Value:</u>	<u>Description:</u>
\$ <u></u>	<u></u>
\$ <u></u>	<u></u>
\$ <u></u>	<u></u>
\$ <u></u>	<u></u>

5. List creditors, including banks, mortgage companies, charge accounts, etc.:

<u>Creditors:</u>	<u>Total Debt:</u>	<u>Monthly Payment:</u>
_____	\$ _____	\$ _____
_____	\$ _____	\$ _____
_____	\$ _____	\$ _____
_____	\$ _____	\$ _____

6. List any major monthly expenditures not included in your answer to No. 5, such as food, insurance, utilities, rent, child support, alimony, etc.:

<u>Description:</u>	<u>Monthly Payment:</u>
RENT PAYMENTS	\$ 260.00
FOOD	\$ 100.00
UTILITIES	\$ 67.00
TELEPHONE	\$ 30.00

7. Marital Status: ☒ Single ☐ Married ☐ Widowed ☐ Separate/Divorced

List Persons you actually support and your relationship to them:

<u>Name:</u>	<u>Relationship:</u>
_____	_____
_____	_____
_____	_____
_____	_____

8. If married, is your spouse employed? ☐ Yes ☐ No

If yes, how much does your spouse earn per month: Gross: \$ _____ Net: \$ _____

9. If you are a minor under age 18, what is your parents' or guardian's approximate monthly income?

Gross: \$ _____ Net: \$ _____

I understand the Court will not consider my Motion unless all the questions are answered.

I declare under penalty of perjury that the information above is true and correct.

29TH DAY OF MARCH, 2007

Date

Signature